

**Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, DC 20554**

In the Matter of)	
)	
Schools and Libraries Universal Service)	WC Docket No. 13-184
Support Mechanism)	

REPLY COMMENTS OF SPRINT CORPORATION

Sprint Corporation (“Sprint”) hereby respectfully submits its reply to comments on the E-rate Eligible Services List (ESL), filed on July 5, 2016, in the above-captioned proceeding. As discussed briefly below, Sprint supports the recommendation of Funds for Learning (FFL) that the Commission temporarily suspend any further phase-down of E-rate support for voice service. FFL stated (p. 1) that freezing voice support at 40% will “ease the financial burden on applicants that defunding voice service has caused.” Sprint agrees.

FFL’s analysis shows that schools and libraries have continued to request E-rate funding for voice service in volume (including 9299 requests for mobile voice for funding year 2016)¹ despite the limited support now available. There can be no dispute that applicants still need voice service to meet the educational needs of students and library patrons. Unfortunately, it appears that the reduction in E-rate support for voice services has forced many schools and libraries to reduce their use of this critical, basic service, or to divert their resources from other endeavors to pay for basic voice services. Sprint’s data indicates that a significant percentage of its E-rate customers have reduced

¹ FFL Comments, p. 2; *see also*, <https://www.fundsforlearning.com/blog/2016/06/lit-fiber-dominates-fy2016-c1-requests>.

or cancelled their mobile voice service since funding year 2015 when the phase-down of support for voice service began. Even if an applicant did not decrease its voice services, its higher out-of-pocket expenditures equate to fewer dollars available for other critical services or projects such as broadband deployment.

Apparently recognizing the potentially dire impact the phase-down might have, the Commission directed the Wireline Competition Bureau to “evaluate the impact of the phase down on eligible schools and libraries....”² The Bureau is to report its findings to the Commission by October 1, 2017, and if the Commission takes no further action, the voice phase down will continue.³ Waiting until funding year 2018 may be too late; as FFL has explained, proceeding with the voice E-rate support phase-down will increasingly place thousands of eligible schools and libraries at risk of having insufficient funds to pay for voice service and/or the non-discounted portion of their broadband services. Accordingly, Sprint recommends that the Bureau begin its evaluation of the impact of the phase-down now, and urges the Commission to adopt FFL’s recommendation to freeze, at least temporarily, the phase-down of E-rate support for voice services.

² *Modernizing the E-rate Program for Schools and Libraries*, 29 FCC Rcd 8870, para. 135 (2014).

³ *Id.*, para. 143.

Respectfully submitted,

SPRINT CORPORATION

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July 20, 2016